

## REMARKS

### Status of the Claims

- Claims 1-22 are pending in the Application
- Claims 1-11, 21 and 22 are previously withdrawn.
- Claims 12-20 are rejected by the Examiner
- Claims 12 and 18 are amended by the Applicant

### Claim Rejections Pursuant to 35 U.S.C. §102

Examiner has rejected Claims 12-20 under 35 U.S.C. §102(b) as being anticipated by US. Pat. No. 5,991,528 to Taylor et al. Applicants respectfully traverse the §102(b) rejection.

Taylor et al. discloses a system that automatically defines a manufacturing plan for producing a part. The data that is derived while determining the manufacturing plan may also be used to generate high quality engineering drawings of the part and to produce a computer simulation that replicates the various manufacturing processes of the plan (Col. 2 line 66 through Col. 3, line 5).

Amended Claim 12 recites a method for generating workflow optimization process for use on manufacturing resources by processing the request by a workflow optimization engine, the workflow optimization engine having at least one instruction set to process data according to predefined manufacturing rules; generating, by the workflow optimization engine, optimization instructions for use with the manufacturing resources; and modifying, by the workflow optimization engine, the optimization instructions based upon identifying inefficiencies of the manufacturing resources. Applicant finds basis for this amendment in paragraphs 0023-0026 of the specification.

Applicant submits that Taylor et al. does not disclose the modification of optimization instructions based upon identifying manufacturing inefficiencies by the workflow optimization engine. Applicant has amended Claim 18 to recite a similar element. Since Taylor et al. fails to teach or suggest modifying, by the workflow optimization engine, the optimization instructions based upon identifying inefficiencies of the manufacturing resources, it cannot anticipate amended independent Claims 12 and 18.

**DOCKET NO.:** ABDT-0575 / B030270  
**Application No.:** 10/699,041  
**Office Action Dated:** 3/16/2005

**PATENT**

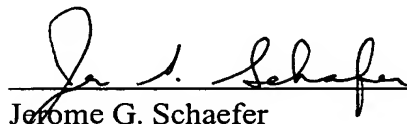
Likewise, since Claims 13-17 depend on amended independent Claim 12 and Claims 19-20 depend on amended independent Claim 18, Applicant submits that all pending claims patentably define over the cited art.

**Conclusion**

In view of the above remarks, Applicant submits that the above remarks traverse the 35 USC §102(b) rejections. Accordingly, Applicants request reconsideration of all pending claims.

Respectfully submitted,

Date: July 18, 2005

  
Jerome G. Schaefer  
Registration No. 50,800

Woodcock Washburn LLP  
One Liberty Place - 46th Floor  
Philadelphia PA 19103  
Telephone: (215) 568-3100  
Facsimile: (215) 568-3439